

**No. PD-0881-20**

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**IN THE  
COURT OF CRIMINAL APPEALS  
OF THE STATE OF TEXAS**

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FILED  
COURT OF CRIMINAL APPEALS  
7/22/2021  
DEANA WILLIAMSON, CLERK

CRYSTAL MASON,

Appellant,

v.

STATE OF TEXAS,

Respondent.

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From the Second Court of Appeals,  
Cause No. 02-18-00138-CR

Trial Court Cause No. 148710D  
From the 432<sup>nd</sup> District Court of Tarrant County, Texas  
The Honorable Ruben Gonzalez, Jr. Presiding

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**Unopposed Motion for Admission *Pro Hac Vice*  
of Julie Veroff**

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*Counsel for Amici Curiae*

*\*Pro Hac Vice Admission Pending*

TO THE HONORABLE COURT OF CRIMINAL APPEALS OF THE STATE OF TEXAS:

Pursuant to Texas Government Code Section 82.001, *et seq.* and Rule XIX of the Rules Governing Admission to the Bar of Texas, non-resident attorney Julie Veroff files this Unopposed Motion for Admission *Pro Hac Vice* (“Motion”) and respectfully requests that this Court enter an order authorizing Julie Veroff to appear *pro hac vice* before this Court. In support of this Motion, Ms. Veroff respectfully states as follows:

1. Ms. Veroff seeks permission to appear *pro hac vice* as counsel for *amici curiae* Donald B. Ayer, Jonathan S. Feld, and other former prosecutors in the above-referenced matter. Ms. Veroff is an associate with the law firm Cooley LLP, 3 Embarcadero Center, 20th Floor San Francisco, CA 94111-4004, Telephone: (415) 693-2000, Facsimile: (415) 693-2222, Email: [jveroff@cooley.com](mailto:jveroff@cooley.com). Ms. Veroff’s California State Bar Number is 310161.

2. Ms. Veroff will be associated in this proceeding with Neal S. Manne, a resident attorney whose Texas Bar Number is 12937980 Mr. Manne is an attorney licensed in Texas who is a partner at the law firm of Susman Godfrey L.L.P., 1000 Louisiana St., Suite 5100, Houston, Texas 77002-5096, Telephone: (713) 651-9366, Facsimile: (713) 654-6666, E-mail: [nmanne@susmangodfrey.com](mailto:nmanne@susmangodfrey.com).

3. Ms. Veroff has not appeared or sought leave to appear in any cases in Texas court within the past two years.

4. Ms. Veroff is an active member in good standing with the Bar of the State of California, the United States District Court for the Northern District of California, the United States District Court for the Central District of California, the United States Court Appeals for the Seventh Circuit, the United States Court Appeals for the Eighth Circuit, the United States Court Appeals for the Ninth Circuit, the United States Court Appeals for the Tenth Circuit, the District of Columbia Court of Appeals, and the United States Court Appeals for the Federal Circuit.

5. Ms. Veroff has not been the subject of disciplinary action by the Bar or the courts of any jurisdiction in which Ms. Veroff is licensed in the past five years.

6. Ms. Veroff has not been denied admission to the courts of any State or to any federal court during the last five years.

7. Ms. Veroff attests that she is familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the State Bar of Texas. Ms. Veroff attests that she will at all times abide by and comply with these rules as long as the Texas proceeding is pending, and she has not withdrawn as counsel in the proceeding.

8. Pursuant to the Texas Rules Governing Admission to the Bar of Texas, Rule XIX(a), Ms. Veroff has filed an application for admission *pro hac vice* with the

Texas Board of Law Examiners and paid the \$250.00 filing fee. The Texas Board of Law Examiner's letter acknowledging the application is attached hereto as Exhibit A.

9. Pursuant to Rule XIX(b) of the Rules Governing Admission to the Bar of Texas, Ms. Veroff submits Mr. Manne's motion concurrently with this Motion, which contains a statement that he finds Ms. Veroff to be a reputable attorney and recommending that Ms. Veroff be granted permission to participate in this matter before this Court.

10. The undersigned counsel has consulted with counsel for Respondent. Respondent does not oppose this motion.

Ms. Veroff respectfully requests that the Court grant this Motion for Admission *Pro Hac Vice* and enter an order allowing Ms. Veroff to participate as an attorney for *amici curiae* in the above-captioned matter.

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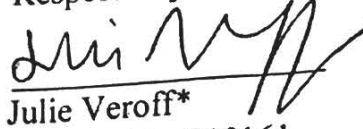
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Dated: July 16, 2021

Neal S. Manne  
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Respectfully submitted,

  
Julie Veroff\*

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Kathleen R. Hartnett\*  
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*Counsel for Amici Curiae*

*\*Pro Hac Vice Admission Pending*

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

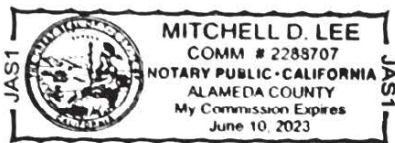
STATE OF CALIFORNIA )

COUNTY OF Alameda )

On July 16, 2021, before me, Mitchell D. Lee Notary Public,  
DATE INSERT NAME AND TITLE OF THE OFFICER

personally appeared Julie M. Veroff  
NAME(S) OF SIGNER(S)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



PLACE NOTARY SEAL ABOVE

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

SIGNATURE OF NOTARY PUBLIC

#### OPTIONAL

*Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.*

#### Description of Attached Document

Title or Type of Document: PD - 0881-20

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

#### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

- ☐ Individual  
☐ Corporate Officer – Title(s): \_\_\_\_\_  
☐ Partner – ☐ Limited ☐ General  
☐ Attorney-in-Fact  
☐ Trustee  
☐ Guardian or Conservator  
☐ Other: \_\_\_\_\_

Signer is representing: \_\_\_\_\_

RIGHT THUMBPRINT  
OF SIGNER

Top of thumb here

# **EXHIBIT A**



**Board of Law Examiners**  
Appointed by the Supreme Court of Texas

June 29, 2021

Julie Veroff  
Via: E-Mail

Acknowledgment Letter  
Non-Resident Attorney Fee

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

**This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:**

**Non-resident attorney: Julie Veroff**

**Case: PD-0881-20**

**Texas court or body: In The Court of Criminal Appeals of the State of Texas, Case No. PD-0881-20,**

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule 19(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule 19(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule 19 of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Cordially,



**Nahdiah Hoang**  
Executive Director

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STREET ADDRESS  
205 West 14th Street, Ste.500  
Austin, Texas 78701

## **CERTIFICATE OF CONFERENCE**

I certify that I conferred with counsel for the Respondent regarding the substance of the foregoing Motion. Respondent's counsel has indicated that they are unopposed to the relief requested in this Motion. Accordingly, this Motion is submitted to the Court for its determination.

/s/ Julie Veroff  
Julie Veroff

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of July, 2021,  
a true and correct copy of the foregoing Unopposed Motion for Admission *Pro*  
*Hac Vice* of Julie Veroff was served electronically through the court's electronic  
filing system on the following counsel of record:

SHAREN WILSON  
Criminal District Attorney  
Tarrant County, Texas

JOSEPH W. SPENCE  
Assistant Criminal District Attorney  
Chief, Post-Conviction

JOHN E. MESKUNAS  
Assistant Criminal District Attorney  
Tim Curry Criminal Justice Center  
401 W. Belknap  
Fort Worth, Texas 76196-0201  
(817) 884-1687  
State Bar No. 24055967  
ccaappellatealerts@tarrantcountytexas.gov

/s/ Julie Veroff  
Julie Veroff

253338403

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Tanya McGinnis on behalf of Neal Manne  
Bar No. 12937980  
tmcginnis@susmangodfrey.com  
Envelope ID: 55540177  
Status as of 7/21/2021 8:48 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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Robert Rivera		rrivera@susmangodfrey.com	7/20/2021 5:42:46 PM	SENT
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Rebecca HarrisonStevens		beth@texascivilrightsproject.org	7/20/2021 5:42:46 PM	ERROR
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Kathleen R.Hartnett		khartnett@cooley.com	7/20/2021 5:42:46 PM	SENT
Julie Veroff		jveroff@cooley.com	7/20/2021 5:42:46 PM	SENT
Darina Shtrakhman		dshtrakhman@cooley.com	7/20/2021 5:42:46 PM	SENT

Associated Case Party: Crystal Mason

Name
Emma Hilbert
Hani Mirza
Alison Grinter
Sophia LinLakin

### **Automated Certificate of eService**

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Bar No. 12937980  
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Envelope ID: 55540177  
Status as of 7/21/2021 8:48 AM CST

Associated Case Party: Crystal Mason

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Savannah Kumar	24120098	skumar@aclutx.org	7/20/2021 5:42:46 PM	SENT